

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

CORNELIUS HILL	:	
and	:	
TRUDIE HASTINGS HILL H/W	:	
Plaintiffs	:	
SCHIFFFAHRTSGESELLSCHAFT MS	:	NO. 02-CV-2713
PRIWALL mbH & Co. KG	:	
and	:	
REEDEREI F. LAEISZ G.m.b.h., ROSTOCK	:	
Defendants	:	JURY TRIAL DEMANDED

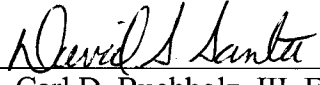
DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBITS NOS. 1, 2, and 3

Defendants Schiffahrtsgesellschaft MS Priwall mbH & Co. KG ("Priwall") and Reederei F. Laeisz G.m.b.h., Rostock ("Laeisz"), by and through its attorneys, Rawle & Henderson, LLP, hereby objects to the admissibility at trial of items No. 1, 2, and 3 on the list of Exhibits submitted by plaintiffs. Defendants object to the admissibility of each Exhibit 1 (Charity Party agreement) and Exhibit 2 (Management contract) on the grounds that any and all contractual provisions contained therein are not relevant because they have no bearing on the duties owed by defendants to the longshore workers. Carpenter v. Universal Star Shipping, S.A., 924 F.2d 1539, 1545 (9th Cir. 1991); Mankus v. Swan Reefer I, C.A. 02-3425 (E.D. Pa. 2003).

Defendants object to Exhibit 3 (Shipboard Manual) on the ground that it has no relevance to the defendants' duties once discharge operations have begun.

Respectfully submitted,

RAWLE & HENDERSON LLP

By: 

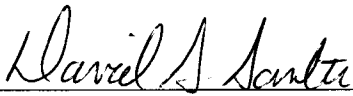
Carl D. Buchholz, III, Esquire
David S. Santee, Esquire
The Widener Building
One South Penn Square
Philadelphia, PA 19107
Phone: (215) 575-4200.
Attorney for Defendants

DATED: March 4, 2004

CERTIFICATE OF SERVICE

I do hereby certify that, on today's date, the foregoing Objections to Plaintiffs' Exhibits Nos. 1, 2, and 3 was served via Hand Delivery to the following counsel of record:

E. Alfred Smith, Esquire
1333 Race Street, 2nd Floor
Philadelphia, PA 19107
Attorney for Plaintiffs



David S. Santee, Esquire

Date: March 4, 2004